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Before the
Federal Communications Commission
 Washington, D.C. 20554

JUN - 9 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

)
 Amendment of Section 73.202(b),
 Table of Allotments,
 FM Broadcast Stations.
 (Latta, Marion, Camden, and
 Blythewood, South Carolina)

) MM Dkt No. 93-47
) RM-8188
)

To: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

REPLY COMMENTS TO COUNTERPROPOSAL
OF
WINFAS OF BELHAVEN, INC.

Winfas of Belhaven, Inc. ("Petitioner") by its attorneys,
 hereby files its Reply Comments to the Counterproposal of
 Joseph Adams Ranke ("Ranke") filed in the above-captioned
 docketed proceeding.

Background

1. Petitioner is licensee of WWPD(FM), Marion, South Carolina. By Notice of Proposed Rulemaking ("NPRM"), 5 FCC Rcd 2095 (1993), the Commission proposed the substitution of FM Channel 232C3 at Latta, South Carolina, for existing FM Channel 232A at Marion, South Carolina, and the modification of WWPD's facilities from Class A at Marion to Class C3 at Latta. On May 10, 1993, Petitioner timely filed its "Comments in Support of Notice of Proposed Rulemaking" in which Petitioner again expressed its interest in the proposal and represented that, upon allotment of the Class C3 channel, Petitioner would take those steps necessary to construct the new facilities. On May 13, 1993, Ranke filed

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his "Comments and Counterproposal" in which he proposed the allotment of FM Channel 232A to the hamlet of Blythewood, South Carolina. Public Notice of Ranke's Counterproposal was given by Report No. 1942, released May 25, 1993, and interested parties were given 15 days, or until June 9, 1993, within which to file reply comments. On May 28, 1993, Petitioner filed "Reply Comments of Winfas of Belhaven, Inc." which showed that Ranke's proposal must be rejected. Petitioner demonstrated that its proposal is preferred to Ranke's because (a) Petitioner would bring a first local service to Latta, South Carolina, while Ranke would bring only a second local service to Blythewood; (b) Latta has a 1990 population of 1,565 while Blythewood has a 1990 population of only 164¹; and (c) Ranke's proposal is in reality designed to bring a 13th city-grade signal to Columbia, South Carolina. Except for the population error discussed in footnote 1, Petitioner hereby incorporates by reference its prior filings in reply to Ranke's counterproposal, and adds the following to support Petitioner's position.

¹ Ranke, in his Counterproposal, stated that the 1990 population of Blythewood is 146, and Petitioner used that figure in preparing its Reply. However, Petitioner's evidence indicates that the population is 18 persons greater, i.e., 164. Petitioner, by this footnote, hereby seeks to correct the numerical error.

More About Blythewood

2. As shown in the Technical Exhibit filed May 28.

town has been annexation because of the small
number of new dwelling units permitted over same
time period. In 1980 there were 37 occupied

requested in Petitioner's Petition, upgrade WWPB to Channel 232C3 at Latta, change the channels of WPUB-FM from Channel 232A to 274A, and DENY Ranke's proposal.

Respectfully submitted,

WINFAS OF BELHAVEN, INC.

By: 

Gary S. Smithwick
Shaun A. Maher
Its Attorneys

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June 9, 1993

EXHIBIT 1

SECTION I

INTRODUCTION

Background and Government

Blythewood is located in the northern section of Richland County in Census County Division 101. It lies at the intersection of Blythewood Road with both U.S. 21 and I-77. The town is approximately 10 miles north of the intersection of I-77 and I-20 and is within easy commuting distance of major job centers in Columbia, Winnsboro, and Camden.

The town boundary as constituted when the town was initially incorporated as Doko in 1879 was a circle with a 1/4 mile radius consisting of about 126 acres. Annexations in the late 1970s added 283 acres and in the 1980s a further 130 acres were annexed east along Sandfield Road and U. S. 21 so that the town now contains about 539 acres or .84 square miles. As will be seen later most of this acreage is undeveloped.

* * *

Within Blythewood itself, the population grew from 70 in 1970 to 92 in 1980 to 164 in 1990. Note that a major reason for population growth in the town has been annexation because of the small number of new dwelling units permitted over same time period. In 1980 there were 37 occupied dwelling units in the town as then constituted but in 1990 there were 65 occupied units much of the increase resulting from annexation. Excluding the effects of possible annexations over the next 20 years, the town's population should not change radically. By the year 2001 there should be an additional 20 occupied housing in the town containing 50 more persons. In the next decade until 2011, another 25 housing units should be occupied by another 63 persons. There will be about 214 persons in town by the year 2001 and a total of about 277 by the year 2011 in the town limits as drawn in 1991. If a small multi-family complex is built during the planning period, then the population will be larger, of course.

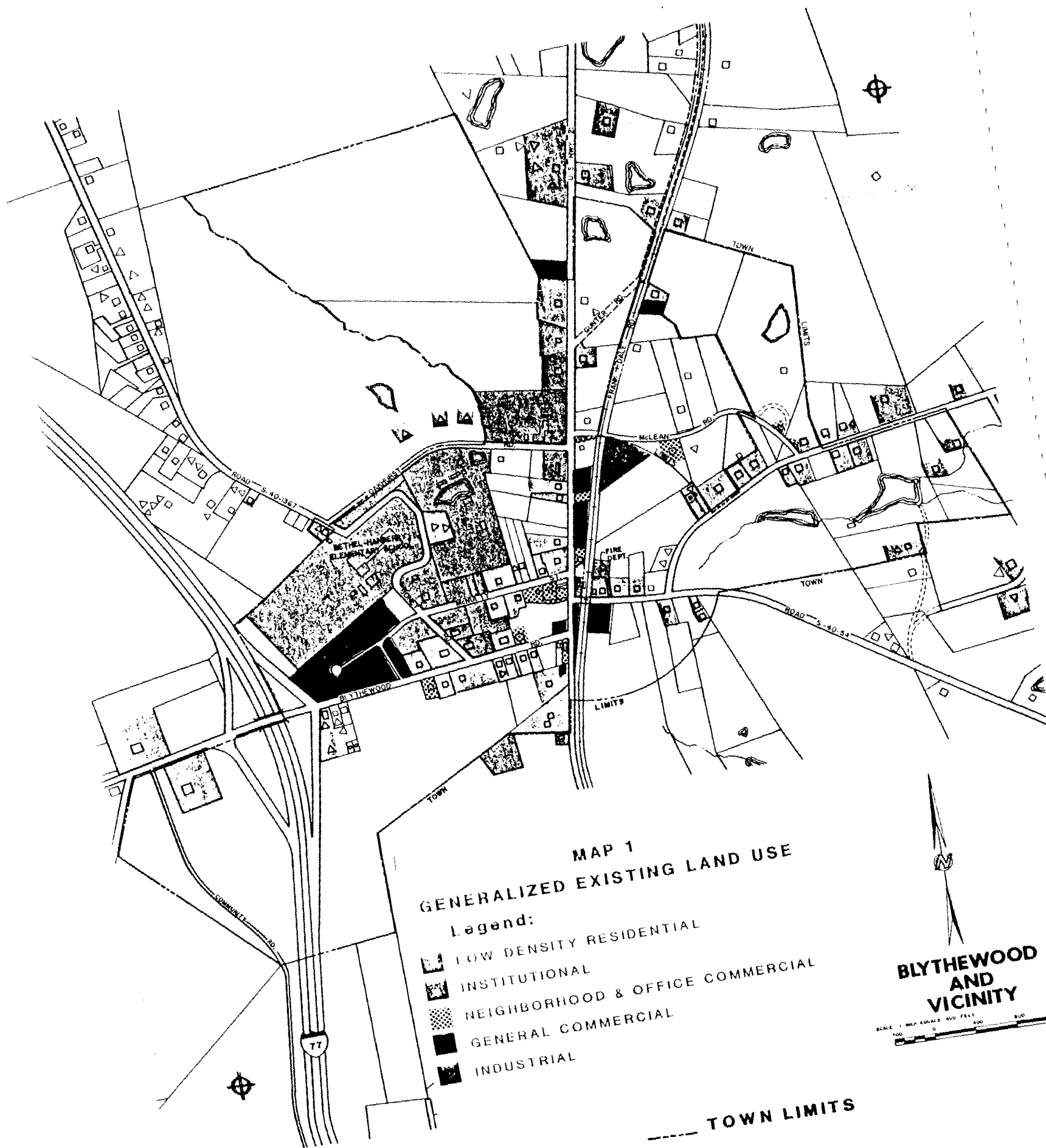
* * *

Infrastructure

The Town of Blythewood is not presently served by water or sewer systems publicly or privately operated. The Town lies within the sewer service area of Wildewood Utilities and when sewer does come to this area they will in all likelihood provide it. It is improbable that sewer service will reach the Blythewood area during the next ten years, however. It is not easy to say when it will reach the town of Blythewood. It will certainly be time to revise the land development before it is ready to be extended by private companies to development near the town limits as now constituted.

The City of Columbia plans to extend water service to Blythewood along I-77 and then along Blythewood Road during the next two or three years. The exact location of the line is not known at this time but it will loop through the Town of Blythewood and will serve users at the Interstate interchange and along Blythewood Road and US 21. The town council should now express its input on the planned location of the line.

EXHIBIT 2



CERTIFICATE OF SERVICE

I, Patricia A. Neil, a secretary in the law firm of Smithwick, & Belendiuk, P.C., certify that on this 9th day of June, 1993, copies of the foregoing were mailed, postage prepaid, to the following:

Leslie K. Shapiro*
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Patricia A. Neil

*hand delivery